

General comments in relation to the qualification CPP5XX22 Diploma of Bushfire Protection Assessment

Stakeholder	Feedback	Action
<p>Industry consultant 1</p>	<p>Feedback on Bushfire Protection Assessment Case for Change December 2021</p> <p>The Rationale for change advises that a nationally available vocational training product comprising a Diploma of Bushfire Protection will provide a skill set for a Bushfire Attack Level Assessor. The rationale has selected a few of the recommendations of the 2009 Victorian Bushfires Royal Commission, final report, July 2010 to support the development of the Diploma Course, however there is already a well developed Post Graduate Diploma, providing specific Bushfire units of study to people with a suitable degree.</p> <p>Graduates can seek accreditation as a Bushfire Consultant, and there is a legislative requirement for a "Recognised Person" or the Council to provide Bushfire Attack Level Certification, at least in NSW.</p> <p>Whilst it would be wonderful to provide the Diploma where needed to assist in understanding basic bushfire concepts, it will not be possible for those receiving training at a Diploma level to make the critical decisions around determining the bushfire attack level, which are commonly extremely nuanced and complex.</p> <p>I believe more coroner enquiries will be required if the outcome of completing this diploma course will allow paraprofessionals to determine a Bushfire Attack Level, and then go on to ensure buildings are properly constructed, where sufficient knowledge cannot be adequately provided by completion of a diploma course.</p> <p>The FPAA non-accredited five-day BAL Assessor Short Course was a stop-gap measure for practitioners based in Western Australia who were providing bushfire assessments with no training. It was not intended to be a long-term measure, and my understanding is that it</p>	<p>Comments noted.</p> <p>Concerns raised in relation to the Diploma of Bushfire Protection Assessment being used to meet educational requirements as part of the industry accreditation scheme for Bushfire Planning and Design (BPAD) consultants, administered by the Fire Protection Association (FPA) of Australia are noted.</p> <p>The development of the qualification is independent of BPAD certification. The FPA Australia will need to assess if the qualification meets their standards for accreditation and at what level. As well as an educational requirement there are other criteria, including experience and sitting an interview, that a person must meet for accreditation purposes.</p>

	<p>was introduced because nobody was able to meet Level 2 or 3 pathways, at the time.</p> <p>The FPAA assured NSW practitioners that Level 1 would never be introduced in NSW as it is thought there are sufficient practitioners, and doing so would lessen the high quality of reporting and ethics upheld by the existing Recognised persons in NSW, who have worked hard to create a working relationship with regulators and gain trust within NSW.</p> <p>I would far rather the existing post graduate courses in Australia be subsidised if cost is a barrier, than bring in a lesser qualification. The number of Accredited Practitioners currently on the FPAA Register does not reflect the number of persons who have successfully completed the post graduate diploma, who are currently working in local government and private practice, without a need to be accredited.</p> <p>Further, many Bushfire Practitioners are working without accreditation in NSW as there is no legislative requirement for accreditation, other than the issue of a Bushfire Attack Level (BAL) Certificate for Complying Development. Some of these Practitioners are highly regarded and accepted as Expert Witnesses in Courtrooms.</p> <p>I think the Diploma course is a good start for those wishing to enter the profession, and a precursor to undergraduate or post graduate study in the field. But absolutely, finishers should not be able to work independently (as an assistant to a practising bushfire consultant only) or authorise development in any way, which is the case for Bushfire Practitioners issuing BAL Certificate for Complying Development applications on bushfire prone land in NSW. This process does not involve any third party such as the Rural Fire Service or Council, and it will be a most unwelcome and dangerous predicament for diploma graduates to find themselves authorising development as a result. This is the NSW legislative link to the process;</p> <p>https://legislation.nsw.gov.au/view/html/inforce/current/epi-2008-0572#sec.1.19A</p>	<p>Comment noted. Thank you for the support.</p>
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	<p>The stakeholder consultation did not include Bushfire Practitioners already working in the industry, who represent the key interest group</p>	
<p>Industry consultant 2</p>	<p>Feedback submitted in relation to Case for Change in late 2019. I would like to nominate my concerns at your Project: Bushfire Planning and Design for developing a Diploma level of qualification following my attempt at establishing a business in Western Australia following the launch of the Fire Protection Association Short Course. I was one of the second round of intakes with the University of Western Sydney Graduate Diploma in Design for Bushfire Prone Areas after completing this course I've published a number of research papers and also completed a Masters in Fire Investigation specialising in bushfire growth and bushfire investigation.</p> <p>In NSW at present the minimum level of qualification is a graduate certificate for Bushfire Planning and Design Level 2 accreditation and graduate diploma for Bushfire Planning and Design Level 3. At present the Grad. Dip is a Level 8 qualification in the Australian Qualification Framework (AQF) and the approach proposed by Artibus is for a Diploma - Level 5 AQF. This is nearly halving the qualification level and providing tack on shortcut training to avoid gaining a graduate diploma. The present Graduate Diploma and Masters is about developing professionals who have the skills to research, develop, describe and most importantly justify safe bushfire design.</p> <p>In completing the Graduate Diploma over 2 years part time the university expert Grahame Douglas provided invaluable advice and coaching to improve my knowledge and business. I had already been a bushfire consultant for 4 years when I commenced the work. A diploma would remove the ability for an expert in the field to coach students as it would be narrowed to a small focus.</p>	<p>Concerns noted about the different AQF levels. There seems to be a perception that the higher the AQF the better and more capable graduates are. The type of learning in higher education and vocational education is different Vocational qualifications are more practical and applied and relate to workplace outcomes. Feedback indicated a perceived lack of professionalism in a person with a diploma and that only those with post graduate qualifications understand ethics and legal liability or have the ability provide performance solutions according to the NCC. There are many people with vocational education and training qualifications, such as builders, plumbers, building designers, building surveyors, land surveyors, and who successfully run their own businesses.</p>

	<p>All of the course aims are presently met and furthered by the current course. I learnt how to write professionally in my undergraduate degree and the current Graduate Diploma already offers coaching in report writing with specific review of single dwelling, subdivision and alternate solution. FPAA have said on multiple occasions that the university post graduate course is not creating people who can measure a slope or write a report. I cannot comment on the Melbourne University course because I attended University of Western Sydney but we did field visits assessing vegetation types and structures plus measuring slopes. My existing reports were reviewed and commented on by Dr Douglas.</p> <p>The approach proposed sounds like it is dumbing down bushfire safety design, developing production workers rather than professionals.</p> <p>I have highlighted my concerns to FPAA.</p> <p>I also highlight the conflict in interest if an accreditation body intends to offer training as is currently occurring.</p> <p>I mentioned in the webform that the qualification description should reference FPAA intention to have the course as a BPAD level 2 qualification. It has not been ratified but I think it's also important this intention is clearly stated in the course description due to the implication to the industry.</p> <p>A second additional comment is that the Graduate Diploma course teaches you how to read and understand planning legislation framework. The diploma course is a national course that may or may not provide planning advice for varying states. I don't expect there would be adequate time in the course to explain the framework of the planning system for each individual state so that people attending the</p>	<p>Comment noted. Beyond the scope of the qualification development itself.</p> <p>The development of the qualification is independent of BPAD certification and cannot be written into the qualification description.</p> <p>Comment noted.</p>
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	<p>I believe the course could fill a niche to get a step in to the industry and could be a step into the existing Post Graduate qualifications in bushfire, or to replace FPAA's existing short course for Level 1 consultants in WA. I strongly disagree with having a diploma short course as equivalent to a Graduate Certificate qualification.</p> <p>Frances Lamb has advised the consultation is based around the development of the course and does not represent acceptance of a qualification, however FPAA have indicated their intent to have the Diploma of Bushfire Protection Assessment as an alternate pathway BPAD Level 2. I believe this a significant reduction in qualification levels and professionalism in the bushfire industry.</p> <p>I strongly support the term "paraprofessional workers" used throughout the documentation provided. The term "paraprofessional" covers a broad range of roles that assist licensed professionals with their day-to-day tasks. The existing postgraduate qualification is identified as a professional qualification with the diploma course able to develop support staff for existing bushfire professionals.</p> <p>I recommend the TAG to liaise with existing universities offering graduate certificate, graduate diploma, and masters courses in bushfire to see if there is potential to achieve RPL following the diploma. This may not be an option due to the AQF rating being far lower and the postgraduate courses typically being completed by people with an undergraduate degree.</p> <p>General comment on State Based Planning Nuances</p> <p>The course is described as a national qualification and references planning and building legislation. The planning system varies widely throughout Australia and there is no reference to state based planning nuances. Excepting vulnerable occupants and subdivisions. At present the Melbourne University and Western Sydney University courses have significant focus on the states of Victoria and New South Wales respectively with the Western Sydney University having a specific core module on planning compliance. The diploma offers little reference to training in this important area which will be a significant issue with legal</p>	<p>Comment noted. Thank you for the support.</p> <p>Comment noted.</p> <p>Comment noted.</p> <p>The project is in communication with University of Western Sydney and the University of Melbourne. Each University will evaluate the qualification on its merit for advanced standing and entry requirements once it is endorsed.</p> <p>Comment noted. As vocational education and training qualifications are national it is expected that legislation, regulations, policies</p>
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	compliance with planning provisions.	etc would be addressed relevant to the jurisdiction of delivery.
Industry consultant 3	I'd recommend the TAG to liaise with existing universities offering graduate certificate, graduate diploma, and masters courses in bushfire to see if there is potential to achieve RPL following the diploma. This may not be an option due to the AQF rating being far lower and the postgraduate courses typically being completed by people with an undergraduate degree.	Comment noted. The project is in communication with University of Western Sydney and the University of Melbourne. Each University will evaluate the qualification on its merit for advanced standing and entry requirements once it is endorsed.
Industry consultant 3	<p>Qualification description: "This qualification reflects the skills and knowledge required by individuals whose work involves bushfire protection assessment and the application of relevant planning, development, and building legislation and policies. Individuals with this qualification provide advice in a range of government and private practice contexts on building requirements in bushfire-prone areas to improve bushfire resilience and safety."</p> <p>A vocation qualification does not provide the skills and in-depth knowledge to provide advice at the above level. The course is valid for training to provide the technical preparation of assessments for a trained, experienced professional to work with a broad range of complex technical issues. A university degree specifically in bushfire protection demonstrates concrete evidence of professional commitment. This is why professions such as architects, engineering, accounting and nursing require qualifications at a degree level.</p> <p>A bushfire practitioner is working within an industry that requires ethics and integrity. Being committed to a profession provides the foundation for this.</p>	<p>Comments noted.</p> <p>While it is true that professions such as architects, engineering, accounting and nursing require degree qualifications. It is also true that there are people with vocational qualifications working as professionals in building design, engineering, accounting and nursing.</p>

	There is a valid need for training of support technicians but not consultants who provide advice.	
Industry consultant 4 on behalf of professional association	<p>Qualification Title OK but Does not reflect outcomes: The occupational roles are not defined as they suggest a vocational course will equip people with the skills to be able to undertake a bushfire assessment.</p> <p>Core: The core units are confusing. There is an high level of accepted knowledge to be able to achieve the outcomes. A person with such knowledge would not seek to enrol in a diploma.</p> <p>I suggest more industry consultation take place to identify how this diploma could be used to provide a real solution to a growing industry that requires to be increased. For example, the NSW Bushfire Enquiry identified the need for more auditing of bushfire prone developments. This would be similar to checking the pool fences or on site wastewater inspections undertaken by council. It appears that the market research undertaken only identified or became fixated on consultants.</p> <p>In NSW there are already a strong consultant community who are qualified with post graduate degrees and there would be little market to expand this through a vocational course. There is little reason to mislead students to think they can provide bushfire assessments when they will still require a post graduate qualification and industry experience.</p> <p>Electives: Once again it would be more beneficial in looking at competencies required by local government or insurance companies ect to audit and check that planning approvals relating to bushfire protection are in place rather than pointlessly training people in skills which they will not be able to use- such as building surveying , emergency evacuation plans and preparation of bushfire assessments for subdivisions</p>	<p>Comment noted.</p> <p>Comments noted. The titles reflect the unit outcomes and indicate what a person would need to know and be able to do once the unit was attained.</p> <p>Comments noted.</p> <p>Comments noted. Vocational qualifications are national. It is sometimes the case that there is little uptake of a qualification in a particular state or territory.</p> <p>Comments noted.</p>

	<p>Other elective units: Ethics, occupational health and safety and liability</p> <p>Other Comments: Please seek further and wider public consultation and use this as an opportunity to help a important industry to grow rather than listen to a few stakeholders who may have vested interests such as providing the training facility or even worse diluting the delivery of the bushfire protection planning instruments. The result of a poorly designed vocational course could be a less safe environment for the community who live in bushfire prone land.</p>	<p>Units addressing ethics, WHS and liability have been added.</p> <p>Comments noted. We have endeavoured to engage with stakeholders around Australia and communicated with peak bodies such as the National Council for Fire and Emergency Services, FPA of Australia and with every local government in Australia to alert them to the project and opportunities for consultation.</p>
Industry consultant 5	<p>What are the implications for people that have previously completed, or are currently completing, the existing Level 2 accreditation post graduate qualifications though University of Melbourne or Western Sydney University?</p>	<p>There are no implications.</p>
Industry consultant 6	<p>Diploma of Bushfire Planning and Design. Overall, it is a well-built structure covering all areas required.</p>	<p>Comment noted. Thank you for support.</p>
Industry consultant 7	<p>Currently BPAD accredited consultants are required to complete both undergraduate and post graduate studies. Bushfire planning is a matter of life safety, much like flooding, suitably qualified professionals should be the minimum qualification to undertake and take liability for said assessment.</p>	<p>Comment noted. This qualification is intended to be a national vocational qualification independent of the BPAD Certification. FPA of Australia will need to assess if the qualification meets their standards for accreditation and if so, at what level.</p>
Industry consultant 8	<p>Firstly though, I am supportive of additional educational opportunities and the role of accreditation schemes however there needs to be a recognition of limitations and clarity for the end users. This should align with existing legislative framework which in NSW has recently been developed to increase construction compliance and public safety. Currently the content to me conflicts with this framework in some</p>	<p>Comment noted. Thank you for support.</p>

	<p>areas, particularly within the construction environment rather than the planning side of assessment.</p>	
<p>Industry consultant 9</p>	<p>I have reviewed the proposed units and they read like a guide to an assessment report. The units do not provide the scientific-based knowledge required to understand fire behavior. The units are simplistic and do not correlate to the relevant planning legislation. I believe this diploma will negatively impact on the level of professionalism required to properly understand fire behavior and the tools required to develop applicable bushfire protection measures. There are number of high quality Graduate Diploma courses that provide the tertiary training required in this field. This diploma will simply dumb down the profession and confuse potential clients in thinking that a simple diploma provides the qualification required to support their developments.</p> <p>The field requires sound tertiary qualifications</p> <p>The course needs to be based on post graduate studies</p>	<p>Comments noted.</p>
<p>University 1</p>	<p>it is very difficult to comment on the suitability and coverage of the units without understanding the BPAD level this course is to align with. I appreciate that this is not your issue and is up to the FPAA however in my mind it is not a separate issue.</p> <p>What you propose is strong coverage for someone learning AS3959 and the challenges with implementing the standard. A person operating at BPAD Level 1 would do well to have completed the units of competency here. They are comprehensive and touching on the big issues a Level 1 needs to know. However, I do not believe it has suitable background knowledge for anyone to operate at BPAD level 2 or 3. For example, the topics on fire behaviour are purely about understanding AS3959 implementation of fire behaviour equations which are limited. Someone who learns these will not necessarily understand the</p>	<p>Comment noted.</p> <p>This qualification is intended to be a national vocational qualification independent of the BPAD Certification. FPA of Australia will need to assess if the qualification meets their standards for accreditation and if so, at what level.</p>

	concepts of fuel, fuel moisture and fire spread in a meaningful way to develop useful alternatives.	
Local government 1	<p>General feedback - this course should integrate with the legislation applicable to the different states and the relevant government regulatory authority (i.e. NSW RFS, Rural Fires Act and PBP 2019 in NSW)</p> <p>Needs better integration with the relevant legislation. Too broad.</p> <p>Some elective units, in my view, should be essential - i.e. CPPBAL5XX7</p> <p>The diploma needs to integrate with the applicable legislation, otherwise its application is questionable.</p>	<p>Comment noted.</p> <p>As vocational education and training qualifications are national it is expected that legislation, regulations, policies etc would be addressed relevant to the jurisdiction of delivery.</p> <p>Comment noted.</p>
Local government 2	They are missing a unit to put it all together and provide context. Eg a unit on ecology and impact of fire management on environment.	<p>Comment noted.</p> <p>These topics are referenced within some of the units. (Bushfire behaviour and planning units).</p> <p>The qualification packaging rules would enable an RTO to import a relevant unit on ecology if required,</p>
Building surveyor	<p>The Level of knowledge to complete the units would be more like and advanced diploma</p> <p>The units and core look good</p>	<p>Thank you for the support.</p> <p>The qualification has been mapped to AQF level 5. An AQF level 6 qualification (Advanced Diploma) would have more strategic outcomes</p>
Peak body	Suggest renaming course so it is not misconstrued with professional consultancy under registration schemes – Diploma of Property Bushfire Protection Assessment	<p>Comment noted.</p> <p>Property has been added to application of each unit.</p>
Feedback on CPPBAL5XX1 Analyse factors affecting bushfire behaviour		
Peak body	Name change to: Analyse factors affecting bushfire behaviour for developed property	The reference to property has been included in the application section.

University 2	Remove reference to bushfire models and consider the use of the word 'risk'. This may have broader implications.	Comment noted. Reference to bushfire models has been removed.
Industry consultant 2	<p>CPPBAL5XX1 Analyse factors affecting bushfire behaviour</p> <p>Item 4.1 - Consider bushfire behaviour models and potential impact for site.</p> <p>Comment – the course is a diploma course and will not have enough scope to examine the nuances of bushfire behaviour models, with inadequate understanding potentially leading to compounding errors in varying models. The course should accept the simplified method of AS3959 (2019) due to the redundancies it offers.</p> <p>Item 4.2 - Analyse identified factors and quantify bushfire risk</p> <p>Quantification of risk and the bounds the student operate in should be clearly defined so that the student does not go outside their level of understanding.</p> <p>Suggest increasing the site assessments quantity to a minimum 10 to 20 sites to explore varied topographies and environments.</p> <p>Disagree with the performance evidence of “quantify bushfire behaviour for site according to recognised bushfire behaviour models”. This should be outside the scope of the course. I recommend the student to be directed to the existing post graduate courses for performance-based solutions where they can be taught techniques to research fire science thoroughly and provide adequate quantification and qualification of bushfire behaviour models.</p>	<p>Removed quantify bushfire behaviour from unit and Performance Evidence</p> <p>Unit is not about conducting a BAL but assessing the factors that impact on bushfire. The outcome of this unit is to assess the factors. BAL is conducted in another unit.</p>
State Training Authority	<p>Comments specific to unit CPPBAL5XX1 Analyse factors affecting bushfire behaviour</p> <p>Application does not seem to provide a summary statement of unit content. Please draft content related to this. Refer Standard 5, Standards for Training Packages 2012.</p> <p>Application-are they producing a 'basic report'. It seems rather complex, as per paragraph 2, they 'transmit solutions to complex</p>	Unit content amended to address comments.

	<p>problems'. Consistency of actions and unit outcome? For consideration. Performance evidence-asks to 'present to stakeholders'. This is not part of element 5, and represents invalid assessment. For consideration. Cross check all knowledge to pc's. for unit integrity.</p>	
<p>Industry consultant 4 on behalf of professional association</p>	<p>Analyse Factors affecting Bushfire behaviour Should concentrate on Method 1- Simplified Method as performance base assessment requires high level application of bushfire behaviour models beyond scope of vocational course. Danger for lowering industry standards if BAL assessments undertaken with limited understanding</p> <p>Analyse factors affecting bushfire behaviour and Conduct a BAL assessment should be combined as one unit. The basic requirements for both units are identifying vegetation fuel loads, determining effective slope, and then using AS 3959 Method 1 as an acceptable solution to determine the BAL. This course will not have enough scope to examine the nuances of bushfire behaviour models, with inadequate understanding potentially leading to compounding errors in varying models. The course should accept the simplified method of AS 3959 (2019) due to the redundancies it offers. The criteria used to describe the performance needed to demonstrate the elements require a high-level application of bushfire behaviour models and mathematical application.</p> <p>There is no such thing as a simple Bushfire assessment, and with only a little knowledge, the BAL could be identified incorrectly. The performance criteria, which identifies "Analyse potential for bushfire for site" requires a detailed understating of bushfire behaviour models and potential impact. Furthermore, analysing identified factors" requires high-level analysis and problem-solving. The evidence for the need for an in-depth analysis can be seen when looking at past BAL approvals in NSW. There has been a history of councils providing their BALs and applicants' self-assessments in the past. This has resulted in incorrect BALs and, even worse, a situation where development may</p>	<p>Unit is not about conducting a BAL but assessing the factors that impact on bushfire. The outcome of this unit is to assess the factors. BAL is conducted in another unit.</p> <p>The unit PUAFIR518 Conduct and record a Bushfire Attack Level (BAL) Assessment is an imported unit and we must comply with the Performance Evidence for the unit requirements.</p> <p>CPPBAL5XX1 Analyse factors affecting bushfire behaviour was a unit recommended by the technical advisory groupstat</p>

	have been constructed to BAL 12.5 in Flame Zone. An example is a recent WSU Masters Research project undertaken in conjunction with Shoalhaven Council involving a building survey of the Conjola Park township after the 2019/20 bushfire event. This research found a number of approved dwellings with incorrect BALs that were destroyed or damaged.	
CPPBAL5XX2 Advise on improvements to existing developments for bushfire resilience		
Industry consultant 4 on behalf of professional association	<p>Advice on Improvements to Existing Developments for Bushfire Resilience and Assess Compliance of Building Materials for Bushfire Resilience</p> <p>These should be combined. Applying AS 3959 and Nash Standards requires an in-depth understanding of building and building surveying. The short course requires the students to determine the structural design and construction materials subject to legislative frameworks. Assessment of a building against AS 3959 standards requires specialised skills. An introductory course looking at building material and the standard would provide an adequate background. The unit of BAL assessment in core and the unit involved in compliance for building design is almost the same. The student is required to identify the BAL and then review the bushfire management plan and standards for construction. A unit in understanding building plans may be helpful.</p>	<p>Comment noted.</p> <p>Improvements to existing developments builds on knowledge and skills gained in the units on building materials, building design and compliance with AS3959.</p> <p>Separate units are retained.</p> <p>A unit has been added on 'Read plans, drawings and specifications for residential buildings.'</p>
Industry consultants 2	<p>CPPBAL5XX2 Advise on improvements to existing developments to enhance bushfire resilience</p> <p>Item 2.5 (Repeated 2.5) Document deficiencies of structures and materials for bushfire risk</p> <p>Comment - this is the task of a building surveyor and should be outside the scope of a diploma course. It could lead the student to potential liability and risk exposure.</p>	<p>Corrected numbering error</p> <p>TAG has advised that this unit is applicable to individuals who might advise owners, architects and designers of residential buildings before they go for approvals.</p>

		Liability and risk is inherent in any business where advice is provided.
Industry consultant 3	<p>CPPBAL5XX2 Advise on improvements to existing developments to enhance bushfire resilience</p> <p>Item 2.5 (Repeated 2.5) Document deficiencies of structures and materials for bushfire risk</p> <p>Comment – this is the task of a building surveyor and should be outside the scope of a diploma course. It could lead the student to potential liability and risk exposure.</p>	<p>Corrected numbering error</p> <p>TAG has advised that this unit is applicable to individuals who might advise owners, architects and designers of residential buildings before they go for approvals.</p> <p>Liability and risk is inherent in any business where advice is provided.</p>
CPPBAL5XX3 Assess compliance of building materials for bushfire resilience		
Peak body	Establish the property's certified compliance level for building materials and assess for bushfire resilience. I am not comfortable with this as written, assessing compliance is a building surveyor job	Comment noted and considered with other feedback suggesting not to use compliance. Unit title to be adjusted to reflect feedback.
Industry consultant 2	<p>CPPBAL5XX3 Assess compliance of building materials with regulations and codes in bushfire prone areas</p> <p>This entire subject should be removed from the course as it is the responsibility of a building inspector not a bushfire consultant. If the TAG wishes to pursue this, investigations should be made as to whether students could get professional liability insurance to cover this activity. Discussions should also be made with the building professional's board.</p>	Comment noted and considered with other feedback suggesting not to use compliance. Unit title to be adjusted to reflect feedback.
Industry consultant 3	<p>CPPBAL5XX3 Assess compliance of building materials with regulations and codes in bushfire prone areas</p> <p>This entire subject should be removed from the course as it is the responsibility of a building inspector not a bushfire consultant. If the TAG wishes to pursue this, investigations should be made as to</p>	Comment noted and considered with other feedback suggesting not to use compliance. Unit title to be adjusted to reflect feedback

	<p>whether students could get professional liability insurance to cover this activity. Discussions should also be made with the building professional's board.</p>	
<p>Industry consultant 8</p>	<p>It should be acknowledged that building construction design and compliance (inspections) are undertaken nationally by Building Surveyors and Registered Certifiers (NSW) in which there are large numbers appropriate to undertake this work. In this regard, whilst the course subjects are worthwhile to enhance their knowledge and therefore useful, the course or accreditation schemes should not endorse accreditation in these areas without a qualification pre-requisite consistent with that of accredited building surveyors and registered certifiers and their limitations. The existing legislative framework particularly in NSW has categorised these practitioners into hierarchies relevant to the complexities of buildings e.g. Building Surveyor (level 1) or Registered Certifier (Level 1) can work on higher risk building such as Class 2 residential high rise and Class 9a multi-storey hospitals etc rather than a lesser qualified Building Surveyor accredited for Class 1a buildings.</p> <p>.....</p> <p>People undertaking the course to enhance skills such as designers or bushfire consultants would need to understand the limitations and completion may not allow you to undertake such work.</p> <p>Bushfire consulting and BAL determination to remain in the <u>planning and design</u> side of development rather than building or construction approval process which is already regulated and insured. Providing the BAL assessment and offering basic construction design advice at planning stage (not construction) would, in my opinion be more appropriate for a trained Level 2 bushfire consultant.</p>	<p>Comment noted and considered with other feedback suggesting not to use compliance.</p> <p>Unit title to be adjusted to reflect feedback</p>

CPPBAL5XX4 Assess compliance of building design for bushfire resilience		
Peak body	Assess compliance of building design for bushfire resilience – if the property design was already approved for BPA, it is compliant. This Diploma cannot re-write compliance unless something else has changed.	Unit may also be relevant where owners, architects and designers seek advice before submitting plans for approval. Provide advice may be a better title and outcome Title to be amended.
Industry consultant 8	Do not use the word compliance. Assessing compliance is what a building surveyor does.	Comment noted and considered with other feedback suggesting not to use compliance. Unit title to be adjusted to reflect feedback
CPPBAL5XX5 Advise on landscaping design measures for bushfire resilience		
Industry consultant 4 on behalf of professional association	Advice on Landscaping Design Measures for Bushfire Reliance This unit should be modified in particular Item 2.2 Assess and record actual and potential fuel loads near buildings. Landscape Design is the most challenging application of bushfire protection measures and why Appendix 4 of the Planning for Bushfire is not prescriptive. Landscape design is one of the critical factors in causing the other bushfire protection measures to fail. The unit could be modified to provide students with the skills to assess whether a designated buffer zone is in place according to an approved landscape plan.	Deleted 2.2 from the unit as 2.1 addresses potential fire risk. Individuals may be a landscaper or working with a landscaper or owner to develop a plan, before approval.
Industry consultant 2	CPPBAL5XX5 Evaluate landscaping design measures for bushfire protection Item 2.2 Assess and record actual and potential bushfire fuel loads near buildings. Comment – this item should be removed. The accurate measure of bushfire fuel loads is highly subjective and often leads to a wide range of results. This topic should be out of the scope of the course with the conservative fuel loads of AS3959 or other relevant legislation used.	Comment noted and 2.2 removed from unit.

Industry consultant 3	Item 2.2 Assess and record actual and potential bushfire fuel loads near buildings. Comment – this item should be removed. The accurate measure of bushfire fuel loads is highly subjective and often leads to a wide range of results. This topic should be out of the scope of the course with the conservative fuel loads of AS3959 or other relevant legislation used	Comment noted and 2.2 removed from unit.
CPPBAL5XX6 Prepare a bushfire emergency plan for domestic premises		
Industry consultant 4 on behalf of professional association	This could be an excellent unit.	Comment noted. Thank you for support.
CPPBAL5XX7 Determine bushfire regulatory requirements for simple subdivisions in bushfire prone areas		
Peak body	1. Determine bushfire regulatory requirements for simple subdivisions in bushfire prone areas developed property exist after Planning, Design and Certification has occurred.	Comment noted that respondent considers unit not required. Unit has been identified as useful for local government purposes.
Government department	Generic terms may be required to cover terminology used in different jurisdictions eg bushfire management plan,	Generic wording will be used to allow for specific jurisdictional terminology.
Industry consultant 4 on behalf of professional association	Determine bushfire regulatory requirements for a simple subdivision in bushfire-prone areas Will this unit lead students to be competent in providing subdivisions in bushfire prone land? The unit involves a student preparing recommendations for a legislative compliance framework. The issue with this is that the student will need to undertake a BAL assessment to determine in the first place whether this is a simple subdivision or not. This leads back to the issue of whether this Diploma provides the competencies for identifying the correct BAL.	Comment noted The individual does not need to undertake a BAL in this unit but have access to and be able to interpret the BAL see PC1.4. BAL assessment is included in the core units Unit is being further refined to clarify outcome.

CPPBAL5XX8 Determine bushfire regulatory requirements for simple subdivisions in bushfire prone areas		
Peak body	1. Determine bushfire regulatory requirements for complex subdivisions in bushfire prone areas (not property specific, BPAD planner role)	Comment noted and along with consideration of other feedback received in relation to planning, the unit is being refined to clarify outcomes.
Government department	<p>If the unit is only asking for 1 assessment, then a complex subdivision will be most appropriate and relevant to all states. If we were to ask for 2 assessments then we could use complex subdivision and then, dependant on state, ask for either a 2nd complex subdivision or (for WA) a local planning scheme amendment or structure plan, in which case this could be changed to complex planning applications (which covers all types)</p> <p>Remove word 'development' from PC1.1</p>	Comment noted and will be considered in refinement of the unit.
Industry consultant 4 on behalf of professional association	<p>Determine bushfire regulatory requirements for complex subdivisions n bushfire prone areas</p> <p>Determine bushfire regulatory requirements for a simple subdivision in bushfire-prone areas</p> <p>Will this unit lead students to be competent in providing subdivisions in bushfire prone land? The unit involves a student preparing recommendations for a legislative compliance framework. The issue with this is that the student will need to undertake a BAL assessment to determine in the first place whether this is a simple subdivision or not. This leads back to the issue of whether this Diploma provides the competencies for identifying the correct BAL.</p>	<p>The individual does not need to undertake a BAL but have access to and be able to interpret the BAL for the purposes of this unit.</p> <p>Comment noted and along with consideration of other feedback received in relation to planning, the unit is being refined to clarify outcomes.</p>
Industry consultant 2	<p>CPPBAL5XX8 Determine land use planning requirements for complex subdivisions in bushfire prone areas</p> <p>This entire subject should be removed from the course. My interpretation of complex subdivision is a performance-based solution where not all</p>	Technical advisory group advised to retain this unit to address planning outcomes.

	acceptable solutions can be complied with. It should be outside the scope of a diploma course.	
Industry consultant 3	CPPBAL5XX8 Determine land use planning requirements for complex subdivisions in bushfire prone areas This entire subject should be removed from the course. My interpretation of complex subdivision is a performance-based solution where not all acceptable solutions can be complied with. It should be outside the scope of a diploma course.	Technical advisory group advised to retain this unit to address planning outcomes.
CPPBAL5XX9 Determine bushfire regulatory requirements for vulnerable occupants in bushfire prone areas.		
Peak body	Determine bushfire regulatory requirements for vulnerable occupants in bushfire prone areas. (this has been done in the BCA 2022 in Spec 43 for Class 9, so is the Diploma graduate now a BCA code consultant because the focus has changed from property protection to vulnerable occupant protection which is a steep difference.)?	Based on technical advisory group advice and other feedback this unit is being removed.
Industry consultant 4 on behalf of professional association	Determine bushfire regulatory requirements for vulnerable occupants in bushfire-prone areas This should be outside the scope of a vocational diploma course. Vulnerable occupants have increased needs for protection and evacuation that should be comprehensively considered by a bushfire design professional using the full framework of bushfire planning and design	Based on technical advisory group advice and other feedback this unit is being removed.
Industry consultant 2	CPPBAL5XX9 Determine land use planning requirements for vulnerable occupants in bushfire prone areas Part of the performance evidence is to prepare an emergency management plan. This should be its own subject.	Based on technical advisory group advice and other feedback the vulnerable occupants unit is being removed. And emergency management plan for domestic premises is a separate unit.

Industry consultant 3	CPPBAL5XX9 Determine land use planning requirements for vulnerable occupants in bushfire prone areas Part of the performance evidence is to prepare an emergency management plan. This should be its own subject.	Based on technical advisory group advice and other feedback the vulnerable occupants unit is being removed. And emergency management plan for domestic premises is a separate unit.
Industry consultant 8	The idea of a person completing this course and then being accredited or believing they can inspect buildings, particularly complex building such as hospitals, high rise residential, aged care and schools over those currently accredited is worrying.	Based on technical advisory group advice and other feedback vulnerable occupants unit is being removed.